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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA**

ALLIANCE FOR THE WILD)	
ROCKIES, et al.,)	
)	
Plaintiffs,)	Case No. 9:24-cv-00010-DLC-KLD
)	
v.)	
)	
TOM VILSACK, in his official)	PROPOSED JOINT CASE
capacity as Secretary of the)	MANAGEMENT PLAN
Department of Agriculture, et al.,)	
)	
Defendants.)	

In accordance with this Court's January 16, 2024, Order, (ECF No. 5), Plaintiffs and Defendants submit the following proposed joint case management plan for resolution of this matter:¹

<u>Event</u>	<u>Deadline</u>
Motions to Dismiss (fully briefed)	Not Necessary
Certification of the Administrative Records	April 17, 2024
Any Motion to Amend the Complaint	Not Necessary
Plaintiffs to Notify Defendants of any Objections to the Administrative Records	May 1, 2024
Any Motion to Complete and/or Supplement the Administrative Records	May 24, 2024
Plaintiffs' Motion for Summary Judgment	June 14, 2024
Defendants' Cross Motion for Summary Judgment and Response	July 26, 2024
Plaintiffs' Response and Reply	August 16, 2024
Defendants' Reply	September 13, 2024
Motion for Summary Judgment (fully briefed)	September 13, 2024

A stipulation as to authenticity and foundation is not appropriate for this case because it will be decided on the certified administrative records and there will be no documents produced in pre-trial disclosures or discovery. ECF No. 5

¹ The U.S. Attorney's Office for the District of Montana was served with the Complaint on January 22, 2024, making Defendants' answer due on March 22, 2024. *See* Fed. R. Civ. P. 12(a)(2). Defendants will answer on or before that date.

¶ 6. The parties will comply with the requirements for the administrative records and hyperlinked briefs set forth in the Order. *Id.* ¶¶ 7, 8.

Respectfully submitted on this 18th day of March, 2024.

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